

**Flynn, Eileen**

---

**From:** Rachel Spillane <lorettarachelspillane@yahoo.com>  
**Sent:** Saturday, February 21, 2015 8:49 AM  
**To:** HSTestimony  
**Subject:** Raised Bill 6765 on Sign Language Interpreters

To Human Services Committee

My name is Rachel Spillane, a certified Interpreter for the Deaf for over 40 years and several of my family members are deaf and use interpreting services.

I agree with raising the standards of interpreting services for interpreters to work in CT. On reading Raised Bill 6765 and attending the Town Meetings regarding this Bill as well as researching other states similar bills regarding interpreting services I would like to raise awareness of inconsistencies in the Bill as well as possibly that if this bill passes in its present form it will hurt the very people it is trying to help. In the legal section I have noted that they actually lowered the certificate levels i.e. NAD 5 to NAD 4. I have worked in the legal field for over 30 years and if anything the standards should be raised not lowered. In the Educational setting: when the school system hires a sign language interpreter, that person has many other titles i.e. interpreter/tutor/aide. The concern I have is that this bill addresses only the interpreter skills and in my experience based on I.E.P guidelines, a deaf child may have other disabilities i.e. deaf/blind, deaf/autistic etc and that particular interpreter may not meet all the mandates of the 6765 standards but has other specialized skills that is outlined in the IEP and is best suited for that child's needs. My fear is this bill oversteps the IEP process where professionals and parents have outlined the specific needs of that child. I meet all the mandates of this law but could not work with a deaf child that had autism. I think an exception clause needs to be inserted to protect the IEP process and in the best interest of the child.

At the town meetings where I attended on this raised bill, there was a discussion on setting up a monitoring board selecting a parent of a deaf child, an interpreter, a interpreter trainer, a deaf professional etc but what qualities does each of the board members have when it comes to evaluating, reprimanding an interpreter.

The grievance process and the appeal process wasn't even explained. What standardized evaluation tools will they use? I asked those questions and they said they were working on that, to me that is not answering my questions. My fear is that this will become very subjective judgment on an interpreter. In other states interpreting laws, their bill has specific details on how they handle evaluation process, hiring, firing interpreters etc. Bill 6765 in its present wording ignores due process. The bill also states that it will institute annual licensure fees and fines but never mentioned the amounts. At the town meetings it was stated that the fees would be left up to the monitoring board. This is unacceptable, in other states similar law they clearly define the due process as well as the amounts of licensure and fines. I as a working interpreter would like to know what is expected in order to work in this state.

Also I am aware that the group that worked on this bill is looking to the state for funding the tracking, registering interpreters, setting up the monitoring board etc. I know the state budget is unable to support something like this, so I don't understand how the enforcement of this bill is going to happen. There are many out of state interpreter agencies and interpreters that work in CT and they won't be on the radar screen under this bill, only the interpreters that live and work in CT who have

registered with the state and with RID (Registry of Interpreters for the Deaf) will be on the radar screen. To me that is unfair.

The Human Resource Dept of each School District as well as RID (Registry of Interpreters for the Deaf) have the ability to screen applicants, evaluate, reprimand an interpreter. RID has a grievance and appeal procedure. So setting up a separate monitoring board when Human Resources and RID already have those procedures in place seems redundant.

Based on my personal experience and opinion I think the wording of this bill should include the exception clause giving I.E.P. priority as well as a waiver form if a deaf person chooses to have an unregistered interpreter do their interpretation, which many other states have. As far as certification levels, the legal section should not have lowering of certificate levels to interpret legal situations at all. Fees and Fines amounts should be stated and not left to a monitoring group especially if the monitoring group is not under a state agency. Due process needs to be built into this law and leave the hiring and firing with Human Resources and RID. No funding is needed there.

If you wish to have further discussion on this matter, I would be more than willing to go to your office to speak with you.

Thank you for your time and attention on this matter.  
Rachel Spillane M.Ed, CSC, OTC